

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

METAFI PRO LIMITED,

Plaintiff,

CIVIL ACTION

CASE NO. 1:24-cv-1180 (DNH/CFH)

V.

NY TRADING, INC.; STARCO
LOGISTICS, INC.; WENZONG DUAN
d/b/a WLT TRADING, LLC; and COLONY
POND MANAGEMENT, LLC,

Defendants.

**DECLARATION OF URGENCY BY HENNA GHAFOOR IN SUPPORT OF
PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER AND ORDER
TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

HENNA GHAFOR, an attorney duly admitted pro hac vice to practice law in this Court in connection with the matter captioned above, hereby affirms under the penalty of perjury pursuant to 28 U.S.C. §1746 that the following is true and correct, as follows:

1. I am a partner with the law firm of MOSAIC Paradigm Law Group PC, lead attorneys for Plaintiff Metafi Pro Limited (“Metafi”). As such, I am fully familiar with the facts set forth herein.

2. I submit this emergency declaration in support of Metafi's application, made by order to show cause, pursuant to F.R.C.P. Rule 65, for a temporary restraining and a preliminary injunction order until a final disposition on the merits in this case: (a) enjoining, preserving and protecting against the assignment, transfer, sale, purchase, and/or any other form of disposition of any rights, title, or interest in the 1902 Miners possessed by any of the Defendants and made issue in this litigation; and (b) specifically enjoining Colony Pond Management, LLC and its agents from preventing Metafi from taking possession of the 616 Miners that Colony Pond has previously admitted are in its possession; and (c) award such other and further relief as the Court deems

appropriate.

3. Metafi has instituted this action for (1) breach of contract (Purchase Agreement) between Plaintiff and New York Trading, Inc.; (2) breach of contract (Shipping Agreement) between Plaintiff and New York Trading, Inc.; (3) breach of contract (Hosting Agreement) between Plaintiff and Colony Pond Management, LLC; (4) double-brokering in violation on 49 C.F.R. Sec. 371 against New York Trading, Inc., Wenzong Duan d/b/a WLT Trading, LLC, and Starco Logistics, Inc.; (5) conversion against Wenzong Duan d/b/a WLT Trading, LLC, Starco Logistics, Inc., and Colony Pond Management, LLC; (6) fraudulent inducement and fraudulent misrepresentations by New York Trading, Inc. and Colony Pond Management, LLC; (7) Strict Statutory Liability Under 49 U.S.C § 14706 against New York Trading, Inc., Wenzong Duan d/b/a WLT Trading, LLC, and Starco Logistics, Inc.; (8) conspiracy between New York Trading, Inc., Wenzong Duan d/b/a WLT Trading, LLC, and Starco Logistics, Inc.

4. This application is immediately necessary because, as set forth more fully in the accompanying Application, Memorandum of Law, and Declaration of Yi Sun, Defendants have been secreting property that rightfully belongs to Plaintiff, whereby extraordinary remedies are needed to preserve Plaintiff's property by enjoining, preserving and protecting against the assignment, transfer, sale, purchase, and/or any other form of disposition of any rights, title, or interest in said assets until a judgment in this matter can be rendered.

5. Accordingly, I respectfully request that the Court grant Plaintiff's application for a temporary restraining order and preliminary injunction against Defendants, and grant such other and further relief as this Court deems just and proper.

6. On October 1, 2024, Summons in a Civil Action was served upon Defendant Wenzong Duan d/b/a WLT Trading, LLC and also on Defendant Starco Logistics, Inc. To date, no Defendants has made a formal appearance in this matter or made contact with the undersigned.

The Application packet, together with notice of Plaintiff's intent to present this Order to Show Cause before this Court are being mailed to all Defendants commensurate with this filing.

7. No prior application for the relief sought herein has been made in this or any other court.

Dated: Houston, Texas
October 3, 2024

/s/Henna Ghafoor
HENNA GHAFOR